

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOE RICHARD “TREY” POOL, III,
TRENTON DONN “TRENT” POOL,
And, ACCELEVATE2020, LLC,

Plaintiffs,

v.

CITY OF HOUSTON, and, ANNA
RUSSELL, in her official capacity as the
City Secretary of the City of Houston,

Defendants.

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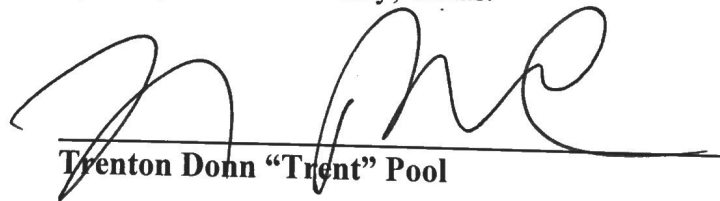
Civil Case No. 4:19-cv-02236

**SECOND SUPPLEMENTAL DECLARATION
OF TRENTON DONN “TRENT” POOL**

I, Trenton Donn “Trent” Pool, declare under penalty of perjury as follows:

1. I am a plaintiff in the above-captioned case. I reside at 1000 Fiesta, Unit A, Austin, Texas. I offer this declaration to supplement the facts already stated in the record.
2. In my supplemental declaration executed June 30, 2019, I stated that “I am currently in Houston and stand ready to begin circulating the anti-corruption petition if the Court grants me relief.”
3. The Court entered the TRO shortly before the close of business on July 1. By that time, I had to return to my home in Austin for family and personal engagements. I had a personal engagement requiring my presence in Travis County on July 2, and my parents’ anniversary on July 3. We also had family engagements on July 4th, as we do every year. I then returned to Houston as soon as possible, and collected signatures for the anti-corruption petition on July 6 and 7 (Saturday and Sunday).

4. I collected these signatures solely as a volunteer who supported the petition. After we secured the TRO on July 1, I had reached out to my contact with the petition organizers, Ben McPhaul, to notify him that the court had enjoined the relevant charter provisions and that we could now hire more circulators and attempt to collect signatures to meet the number required by the charter, if it was viable to make a big push in the last days. Mr. McPhaul responded that it was essentially already too late, stating something to the effect of “because of these laws, we have not been able to approach the signature threshold and it would not make sense to hire anyone at this point.”
5. Still, I returned to Houston as indicated above and collected signatures as a volunteer. I submitted those signatures, forty in total, to Mr. McPhaul to be submitted to the City if and when they submitted the petition.
6. It is my understanding that they have not submitted the petition because they did not collect enough signatures. It is also my understanding that the Charter prohibition on non-registered-voter and non-resident circulators greatly hindered their efforts to collect signatures in this petition.
7. Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the statements contained herein are true and correct.
8. If called upon to testify, I would testify competently as to matters stated herein.
9. Executed September 12, 2019, in Harris County, Texas.



Trenton Donn “Trent” Pool